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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. 14-CR-00117 JST
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE CASE AND EXCLUDE TIME
v.)	UNDER THE SPEEDY TRIAL ACT
)	
JOEL MANUEL TAYLOR)	
a/k/a Joel Fears,)	
a/k/a Joe Taylor,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED, by and between the parties to this action, that the STATUS HEARING date of June 13, 2014 presently scheduled at 9:30 a.m., before the Honorable Jon S. Tigar, be vacated and re-set for July 11, 2014 at 9:30 a.m. for STATUS HEARING.

The reason for this request is that the defense counsel has requested additional time to continue to investigate the matter and confer with his client. Further, the defense counsel will be frequently out of the office for medical follow-ups and physical therapy appointments.

The parties agree and stipulate to the exclusion of time under the Speedy Trial Act to allow for effective preparation of counsel and continuity of counsel. For those reasons, time is excludable pursuant to 18 U.S.C. § 3161 (h)(7)(A), and (h)(7)(B)(iv).

STIP. REQ. TO CONTINUE AND EXCLUDE TIME
NO. CR-14-00117 JST

1 Given these circumstances, the ends of justice is served by excluding time until July 11, 2014
2 from Speedy Trial Act calculations outweighs the interests of the public and the defendant to a speedy
3 trial in accordance with 18 U.S.C. § 3161(h)(7)(A), and (h)(7)(B)(iv).

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5 DATED: June 12, 2014

Respectfully submitted,

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7 MELINDA HAAG
United States Attorney

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9 /s/ Jerome Matthews
10 JEROME MATTHEWS
Attorney for Defendant

/s/ Roger Dinh
ROGER DINH
Special Assistant United States Attorney

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13 **ORDER**

14 Based on the reasons provided in the stipulation of the parties above, with the consent of both
15 parties, the Court orders that the above-captioned matter be continued to July 11, 2014 at 9:30 a.m., and
16 that time be excluded from the date of this order to July 11, 2014 pursuant to 18 U.S.C. § 3161(h)(7)(A)
17 and (h)(7)(B)(iv).

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20 IT IS SO ORDERED.

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22 DATED: June 12, 2014


23 HON. JON S. TIGAR
United States District Judge